

**SUPERIOR COURT OF NJ
REC'D**

JAN 18 2003

**DONALD F. PHELAN
CLERK**

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ471-02-1(9)

Superior Court

Docket Number

03-01-00015-S

STATE OF NEW JERSEY)

INDICTMENT

v.)

LUZ RUIZ)

LUZ BELTRAN)

FLORENTINO ROBLES)

and)

TANYA GONZALEZ)

The Grand Jurors of and for the State of New Jersey, upon
their oaths, present that:

COUNT ONE

(Conspiracy - Third Degree)

LUZ RUIZ

LUZ BELTRAN

FLORENTINO ROBLES

AND

TANYA GONZALEZ

who are named as defendants herein, and Iris Salkauski, who is a
conspirator but who is not named as a defendant herein, and
others whose identities are known to the Grand Jurors but who are
not named as defendants herein, between on or about December 9,
1996, and on or about July 24, 2000, at the City of Camden, at

the Townships of Voorhees, Cherry Hill and Pennsauken, at the Borough of Bellmawr, all in the County of Camden, at the Commonwealth of Pennsylvania, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the crime of theft by deception, did agree that:

- A. One or more of them would engage in conduct which would constitute the aforesaid crime or an attempt or solicitation to commit such crime; or
- B. One or more of them would aid in the planning, attempt, solicitation or commission of said crime, that is:
 - 1. Purposely obtain the property of another in excess of \$500 by deception, in violation of N.J.S.A. 2C:20-4.

The Grand Jurors aforesaid, upon their oaths, do further present that in pursuance of the said conspiracy, the following Overt Acts, among others, were committed:

OVERT ACTS

- 1. On or about December 9, 1996, at the City of Camden, in the County of Camden, the said LUZ BELTRAN was the driver of a vehicle involved in a staged collision.
- 2. On or about December 9, 1996, at the City of Camden, in the County of Camden, the said LUZ RUIZ was an occupant in a vehicle involved in a staged collision.
- 3. On or about December 9, 1996, at the City of Camden, in the County of Camden, the said TANYA GONZALEZ was an

occupant in a vehicle involved in a staged collision.

4. On or about December 9, 1996, at the City of Camden, in the County of Camden, the said FLORENTINO ROBLES was the driver of a vehicle involved in a staged collision.

All contrary to the provisions of N.J.S.A 26:5-2, and against the peace of this State, the government and dignity of the same.

COUNT TWO

(Attempted Theft by Deception - Third Degree)

LUZ RUIZ

and

TANYA GONZALEZ

between on or about December 9, 1996, and on or about July 24, 2000, at the City of Camden, at the Townships of Voorhees, Cherry Hill and Pennsauken, at the Borough of Bellmawr, all in the County of Camden, at the Commonwealth of Pennsylvania, elsewhere, and within the jurisdiction of this Court, did purposely obtain or attempt to obtain property of another, in excess of \$500, by deception, that is, the said LUZ RUIZ and TANYA GONZALEZ did purposely attempt to obtain the property of Allstate Insurance Company in excess of \$500 by creating or reinforcing the false impression that an automobile collision that occurred in the City of Camden on December 9, 1996 was accidental; and that Personal Injury Protection (PIP) insurance claims and insurance claims for non-economic losses were compensable pursuant to automobile insurance policies in connection with the planned and staged automobile collision;

WHEREAS, IN TRUTH AND IN FACT, as the said LUZ RUIZ and TANYA GONZALEZ well knew, the automobile collision which occurred in the City of Camden on December 9, 1996 was not accidental, but was planned and staged, and the Personal Injury Protection (PIP) insurance claims and insurance claims for non-economic losses

submitted to Allstate Insurance Company were not compensable in connection with the planned and staged automobile collision, contrary to the provisions of N.J.S.A. 2C:5-1, N.J.S.A. 2C:20-4 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THREE

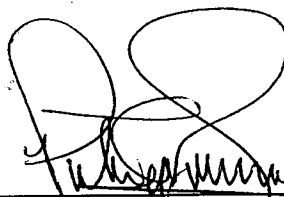
(Theft by Deception- Third Degree)

LUZ BELTRAN

between on or about December 9, 1996, and on or about July 24, 2000, at the City of Camden, at the Townships of Voorhees, Cherry Hill and Pennsauken, at the Borough of Bellmawr, all in the County of Camden, at the Commonwealth of Pennsylvania, elsewhere, and within the jurisdiction of this Court, did purposely obtain or attempt to obtain property of another, in excess of \$500, by deception, that is, the said LUZ BELTRAN did purposely obtain or attempt to obtain the property of Allstate Insurance Company in excess of \$500 by creating or reinforcing the false impression that an automobile collision that occurred in the City of Camden on December 9, 1996 was accidental; and that Personal Injury Protection (PIP) insurance claims and insurance claims for non-economic losses were compensable pursuant to automobile insurance policies in connection with the planned and staged automobile collision;

WHEREAS, IN TRUTH AND IN FACT, as the said LUZ BELTRAN well knew, the automobile collision which occurred in the City of Camden on December 9, 1996 was not accidental, but was planned and staged, and the Personal Injury Protection (PIP) insurance claims and insurance claims for non-economic losses submitted to Allstate Insurance Company were not compensable in connection with the planned and staged automobile collision, contrary to the provisions of N.J.S.A. 2C:20-4, N.J.S.A. 2C:5-1 and N.J.S.A.

2C:2-6, and against the peace of this State, the government and
dignity of the same.



Peter C. Harvey, F.A.A.G.
Director
Division of Criminal Justice

A TRUE BILL:


_____, Foreperson

Dated: 1/13/03